UNITED STA	TES BAN	KRUPT	CY C	COURT
SOUTHERN 1	DISTRIC	Γ OF NE	W Y	ORK

IN RE: ::

**SEARS HOLDINGS CORPORATION**, et als : CHAPTER 11

: Case No. 18-23538(rdd)

Debtors

: (Jointly Administered)

# NOTICE of WITHDRAWAL WITHOUT PREJUDICE of CURE OBJECTION of MACDADE MALL ASSOCIATES, L.P. (Store #3597)

#### TO THE CLERK:

Because the Debtors filed and served a Notice of Amended Cure Costs on January 23, 2019, (D.I. #1774) which set forth a revised cure figure acceptable to the Objector, kindly mark the Cure Objection filed by MacDade Mall Associates, L.P. on January 22, 2019, as D.I. #1733) as "WITHDRAWN", without prejudice to reassert it (or to assert a new cure objection) if the Debtors further amend the stated cure cost for the Objector's Lease.

## KAPLIN STEWART MELOFF REITER & STEIN, P.C.

By: <u>/S/ William J. Levant, Esquire</u>

William J. Levant, Esquire

KAPLIN STEWART MELOFF REITER & STEIN, P.C.

910 Harvest Drive Post Office Box 3037 Blue Bell, PA 19422

(610)260-6000

(610)684-2020 - Telecopier

wlevant@kaplaw.com

Counsel for MacDade Mall Associates, L.P.

Date: February 11, 2019

SOUTHERN DISTRICT OF NEV	V YORK	
IN RE:		x :
SEARS HOLDINGS CORPORAT	TION, et als	: CHAPTER 11
	Debtors	: Case No. 18-23538(rdd): : (Jointly Administered)

## **CERTIFICATE of SERVICE**

I hereby certify, pursuant to 28 U.S.C. §1746, that on February 11, 2019, I caused a true and correct copy of the foregoing Withdrawal of Cure Objection to be sent to each of the persons named on the attached Service List, by email (unless otherwise stated).

# KAPLIN STEWART MELOFF REITER & STEIN, P.C.

By: /S/ William J. Levant, Esquire

William J. Levant, Esquire

KAPLIN STEWART MELOFF REITER & STEIN, P.C.

910 Harvest Drive Post Office Box 3037 Blue Bell, PA 19422 (610)260-6000 (610)684-2020 – Telecopier

wlevant@kaplaw.com

Counsel for MacDade Mall Associates, L.P.

#### SERVICE LIST

#### I. Bid Notice Parties

a. Debtors

Rob Riecker: rob.riecker@searshc.com Luke Valentino: luke.valentino@searshc.com Mohsin Meghji: mmeghji@miiipartners.com General Counsel: counsel@searshc.com

b. Debtors' counsel

Ray Schrock, Esq.: ray.schrock@weil.com
Jacqueline Marcus, Esq.: jacqueline.marcus@weil.com
Garrett A. Fail, Esq. garrett.fail@weil.com
Sunny Singh, Esq. sunny.singh@weil.com

- c. Debtors' investment banker: project.blue.rx@lazard.com
- II. Buyer Parties
  - a. Buyer

Kunal S. Kamlani: kunal@eslinvest.com Harold Talisman: harold@eslinvest.com

b. Counsel

Christopher E. Austin, Esq.: caustin@cgsh.com Benet J. O'Reilly, Esq.: boreilly@cgsh.com Sean A. O'Neal, Esq.: soneal@cgsh.com

#### III. Consultation Parties

a. Bank of America

Paul Leake, Esq.: Paul.Leake@skadden.com Shana Elberg, Esq.: Shana.Elberg@skadden.com George Howard, Esq.: George.Howard@skadden.com

b. Wells Fargo Bank

Kevin J. Simard, Esq.: ksimard@choate.com Jonathan D. Marshall, Esq.: jmarshall@choate.com

c. Committee

Ira S. Dizengoff, Esq.: idizengoff@akingump.com Philip C. Dublin, Esq.: pdublin@akingump.com Abid Qureshi, Esq.: aqureshi@akingump.com Sara L. Brauner, Esq.: sbrauner@akingump.com

[CONTINUED on NEXT PAGE]

# [CONTINUED from PREVIOUS PAGE]

Transform Holdco, LLC

Via First Class Mail

c/o ESL Partners, Inc.

Attention: Kunal S. Kamlani and Harold Talisman

1170 Kane Concourse, Suite 200 Bay Harbor Islands, FL 33154

**Sears Holdings Corporation** 

Via First Class Mail

Attn: General Counsel 3333 Beverly Road

Hoffman Estates, IL 60179

Weil, Gotshal & Manges LLP

Via First Class Mail

Attention: Ray C. Schrock, P.C.,

Ellen J. Odoner, Gavin Westerman and Sunny Singh

767 Fifth Avenue

New York, New York 10153

Cleary Gottlieb Steen & Hamilton LLP

Via First Class Mail

Attention: Christopher E. Austin,

Benet J. O'Reilly and Sean A. O'Neal

One Liberty Plaza

New York, NY 10006